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Federal Public Defender
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Counsel for Defendant JOSE PRADO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 05-00762-JF
)	
Plaintiff,)	
)	
v.)	STIPULATION AND
)	ORDER TO CONTINUE STATUS DATE
JOSE PEPE PRADO,)	
)	
Defendant.)	
_____)	

Assistant United States Attorney Susan Knight and defendant, Jose Prado, through his counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status date in the above-captioned matter, presently scheduled for March 8, 2006, at 9:00 a.m., should be continued to March 29, 2006.

The parties stipulate and agree that the status date should be continued because counsel for Mr. Prado needs additional time to investigate this case and to collect prior criminal records before she can advise Mr. Prado on whether or not he should file motions, enter a plea or proceed to trial. Additionally, counsel for Mr. Prado needs additional time to review tapes of an immigration hearing, which were recently provided to the defense in discovery. The parties further stipulate and agree that under 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv), the ends of justice served by the continuance requested outweigh the best interest of the defendant and public in a speedy trial because the failure to grant such a continuance would unreasonably deny Mr. Prado

1 the time necessary for effective preparation, taking into account the exercise of due diligence.

2
3 SO STIPULATED.

4
5 Dated: March 6, 2006

/s/

ANGELA M. HANSEN
Assistant Federal Public Defender

6
7
8 Dated: March 6, 2006

/s/

SUSAN KNIGHT
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 05-00762-JF
)	
Plaintiff,)	[PROPOSED] ORDER CONTINUING
)	STATUS DATE AND EXCLUDING
v.)	TIME
)	
JOSE PEPE PRADO,)	
)	
Defendant.)	
_____)	

The parties have jointly requested to continue the status date and good cause appearing, IT IS HEREBY ORDERED that the status date presently set for March 8, 2006 at 9:00 a.m. is continued to March 29, 2006 at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from February 8, 2006 through and including March 29, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: March _7_, 2006



JEREMY FOGEL
United States District Judge

1 Distribute to:

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3 Assistant Federal Public Defender
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